

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ROTHSCHILD BROADCAST  
DISTRIBUTION SYSTEMS, LLC

Plaintiff,

vs.

LYNDA.COM, INC.

Defendant.

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Case No: 2:16-cv-1263-RWS

**UNOPPOSED MOTION TO SUBSTITUTE PARTIES**

Defendant Lynda.com, Inc. (“Lynda.com”), Plaintiff Rothschild Broadcast Distribution Systems, LLC (“RBDS” or “Plaintiff”), hereby submit this Joint Motion to Substitute Parties and in support thereof state:

1. On November 11, 2016, RBDS filed an action in this Court against Lynda.com, Inc. for alleged infringement of U.S. Patent No. 8,856,221 (“the patent-in-suit”).
2. Lynda.com represents and warrants that:
  - a. Lynda.com is a non-existent party, as Lynda.com has merged into LinkedIn Corporation, a Delaware company headquartered in Sunnyvale, California, and Lynda.com no longer exists.
3. In reliance on the representations and warranties made in Paragraph 2 above, RBDS believes that LinkedIn Corporation is a proper defendant in this litigation and should be substituted for Lynda.com as the defendant in the above-captioned action so that all claims made against Lynda.com are now made against LinkedIn Corporation.

4. Lynda.com and RBDS further agree to dismiss Lynda.com without prejudice as allowed under Rule 41(a)(2) of the Federal Rules of Civil Procedure.

5. RBDS has not released, and nothing in this Stipulation should be construed as a release or discharge of, any claim RBDS has or may have in the future against any defendant named in these actions or any other asserted infringer of the patents-in-suit. All other rights have been expressly reserved.

6. Lynda.com and RBDS agree that if RBDS forms a reasonable belief through discovery that Lynda.com is making, offering for sale or selling in the United States, or importing into the United States, any of the products or instrumentalities accused of infringement in the Complaint, or any products that are substantially similar, Lynda.com will not raise or rely on this stipulation in opposition to any motion to add Lynda.com as a defendant in these actions.

Accordingly, Lynda.com and RBDS request that the Court enter the attached order dismissing Lynda.com without prejudice, and substituting LinkedIn Corporation as a defendant.

Dated February 10, 2017

Respectfully Submitted,

/s/ Jay Johnson

Jay Johnson

State Bar No. 24067322

Brad Kizzia

State Bar No. 11547550

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**ATTORNEYS FOR PLAINTIFF  
WIRELESS MONTIROING SYSTEMS,  
LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 10, 2017.

/s/Jay Johnson

Jay Johnson